

DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Marshall S. Huebner
Benjamin S. Kaminetzky
James I. McClammy
Christopher S. Robertson

*Counsel to the Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

)
)
)
)
)
)
)

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**NOTICE OF FILING OF STIPULATION OF SETTLEMENT AND AGREED ORDER
REGARDING OFFICIAL COMMITTEE'S MOTIONS TO COMPEL AND DEBTORS'
MOTION FOR PROTECTIVE ORDER**

PLEASE TAKE NOTICE THAT that, on November 6, 2020, Purdue Pharma L.P. and certain of its affiliates that are debtors in possession (collectively, the "Debtors") and the Official Committee of Unsecured Creditors appointed in the above-captioned chapter 11 cases (the

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014).

“Chapter 11 Cases”) of the Debtors (the “Official Committee”) filed the *Notice of Agreement Between Debtors and Official Committee of Unsecured Creditors Regarding Privilege Motions and Adjournment of Hearing with Respect to Remaining Privilege Disputes as to the Sacklers* [ECF No. 1908] (the “Notice of Agreement”) announcing that the Official Committee and the Debtors had reached an agreement (the “Debtor Privilege Resolution”) regarding the relief sought as to the debtors in the *Official Committee of Unsecured Creditors’ Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Failure of the Sacklers and the Debtors to Demonstrate Documents Identified on Logs Are Privileged* [ECF No. 1752] and the *Official Committee of Unsecured Creditors’ Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Good Cause, Crime Fraud, and at Issue Exceptions to Claims of Privilege* [ECF No. 1753], and the relief sought in the *Debtors’ Omnibus Objection to the Official Committee’s Motions to Compel Production of the Debtors’ Privileged Documents and Cross-Motion for a Protective Order* [ECF No. 1808].

PLEASE TAKE FURTHER NOTICE that the Notice of Agreement stated that the Debtors and the Official Committee would file a stipulation setting forth in detail the terms of the Debtor Privilege Resolution.

PLEASE TAKE FURTHER NOTICE that the Debtors, the Official Committee, and the Ad Hoc Group of Non-Consenting States (“NCSG”) have reached agreement regarding the Stipulation of Settlement and Agreed Order Regarding Official Committee’s Motions to Compel and Debtors’ Motion For Protective Order attached hereto as **Exhibit 1**.

Dated: November 15, 2020
New York, New York

By: /s/ Benjamin S. Kaminetzky
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Marshall S. Huebner
Benjamin S. Kaminetzky
James I. McClammy
Christopher S. Robertson

*Counsel to the Debtors
and Debtors in Possession*